Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of:)	
Lifeline and Link Up Reform and Modernization))	WC Docket No. 11-42
Lifeline and Link Up)	WC Docket No. 03-109
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23

THE TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO'S SUPPLEMENT TO PETITION TO OPT OUT OF THE NATIONAL LIFELINE ACCOUNTABILITY DATABASE

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TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY2
II.	BACKGROUND
III.	RESPONSE TO INFORMATION REQUESTED BY THE COMMISSION 4
	A. Describe How Exceptions Are Handled For Subscribers Who Would Otherwise be Excluded Because They Share an Address With Another Household
	B. Describe how the Database Web Application and the Monthly ETC Submission on CD Interact to Allow for Updates to Subscriber Records and for Auditing of Subscriber Records to Scrub Individual and Household Duplicates from ETCs' Subscriber Rolls
	1. The Board is Moving Toward On-Line Updates to Subscriber Records 6
	2. Submission of CDs and DVDs will Continue to be Used to Audit Subscriber Rolls Prior to Payment of Benefits
	3. Effectiveness of the Combination of On-Line Database Access and Monthly Submission of Subscriber Record on CD or DVD
	C. Describe How the Board Verifies Identification for Subscribers Who Do Not Enroll In Lifeline Through Coordinated Enrollment
	D. The Board Commits to Retaining Subscriber Records for a Period of Ten Years 8
IV.	CONSEQUENCES OF DENYING PETITION
	A. Double Surnames
	B. Unique Address Formats
V.	CONCLUSION

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THE TELECOMMUNICATIONS REGULATORY BOARD OF PUERTO RICO'S SUPPLEMENT TO PETITION TO OPT OUT OF THE NATIONAL LIFELINE ACCOUNTABILITY DATABASE

The Telecommunications Regulatory Board of Puerto Rico ("Board") respectfully submits this supplement to its petition to opt out of the National Lifeline Accountability Database ("NLAD"). In addition, the Board certifies that its database meets each requirement described in the Commission's October 11, 2012 Public Notice ("Public Notice").

I. INTRODUCTION AND SUMMARY

In the Lifeline and Linkup Reform and Modernization Order ("Lifeline Reform Order"), the Commission modernized the Universal Service Fund's Lifeline program to mitigate waste, fraud, and abuse. The Lifeline Reform Order set the framework for a National Database to identify duplicative Lifeline support. The order and corresponding rules permit states to "opt-out of the duplicates database requirements...if they certify one time to the Commission that they have a comprehensive system in place to check for duplicative federal Lifeline support that is as

at least as robust as the processes adopted by the Commission, and that covers all ETCs operating in the state and their subscribers."

The Board has previously filed a Petition to Opt Out of the National Lifeline Accountability Database in which it certified that it believes that it meets the standard adopted by the FCC and respectfully requested a waiver. Based on feedback from the Commission in response to the Board's Petition, the Board submits this Supplement to provide additional information regarding questions raised by the Commission and to describe enhancements to the database that have been made since the Petition was filed, or that are anticipated to be implemented in the next few months.

II. BACKGROUND

The Board is responsible for regulating telecommunications and granting cable franchises in Puerto Rico.² It has a statutory mandate from the Puerto Rico General Assembly to "preserve and promote universal service through predictable, specific and sufficient support mechanisms" while ensuring that the Lifeline subsidy is limited to "a single wireline telephone line or to a single wireless service for the family unit."

In discharging its statutory obligation, the Board has been taking steps to reduce from its Lifeline rolls residents who are improperly receiving double (or triple or more) benefits per person or family unit. In 2011, the Board began auditing the Lifeline program in Puerto Rico because of the many instances where the subscribed participants were receiving the service from

See Lifeline and Link Up Reform and Modernization et al., WC Dkt. Nos. 11-42 et al., CC Dkt. No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (2012), ¶ 221 (Lifeline Reform Order).

² 27 L.P.R.A. § 265 et seq.

³ 27 L.P.R.A. § 269e(a)(1).

⁴ 27 L.P.R.A. § 269e(d)(3).

more than one carrier or were receiving more than one service from the same carrier. To date, the Board has had significant success in reducing duplicative Lifeline support in Puerto Rico, due to the fact that it also commissioned a centralized database.

III. RESPONSE TO INFORMATION REQUESTED BY THE COMMISSION

To opt out of the NLAD, a state database must meet the specific functionality enumerated in the Lifeline Reform Order.⁵ The Board provided a description of how the Board's database meets those functionalities in its Petition. In response, the Commission identified several areas for which it seeks additional information. Each question presented by the Commission is summarized below, followed by a brief explanation of how the Board's database ensures that qualified subscribers receive the Lifeline benefits for which they are eligible, while eliminating duplicative Lifeline support.

A. Describe How Exceptions Are Handled For Subscribers Who Would Otherwise be Excluded Because They Share an Address With Another Household

All ETCs in Puerto Rico—wireline and wireless—must obtain verification for a Lifeline subscriber, prior to receiving reimbursement for providing the Lifeline discount. This is done by obtaining a control code assigned by the Board, which is provided simultaneously with the applicant's verification in the central database.⁶ A control code is a unique identifier generated for a specific Lifeline applicant and a specific ETC. Once a control code has been issued, the subscriber's residential address and social security number is stored in the Board's database immediately, preventing the subscriber from soliciting Lifeline service from another ETC. Alternately, an ETC cannot randomly generate a control code for a hypothetical Lifeline

See § 14.5 of Regulation 8093 filed at PR Department of State, on October 2011.

4

⁵ See Lifeline Reform Order, 27 FCC Rcd at 6752, ¶¶ 212-220.

subscriber. A Lifeline subscriber must obtain a new control code each time he or she switches Lifeline service providers.

A control code is not assigned for a potential Lifeline customer if her or his address already exists in the central database. An exception process is in place for subscribers whose addresses are in the database, but who argue that they share the address with another Lifeline subscriber household. This situation is not uncommon. For example, several homes, with separate households, may be located on one parcel of land, which they share, but that has a single address. Alternatively, a multi-family dwelling may contain several single-family units, but have only one street address. In such cases, the applicant has the option to petition the Board for a review as part of the exceptions process.

In instances when a potential Lifeline customer is denied a control code, the ETC provides the customer with a copy of a printed notice generated by the database that identifies the reason the benefit was denied (See Exhibit A for an example of the notice). The potential customer may then appeal the denial in person or via email by presenting to the Board the denial notice, along with verification of his or her address in addition to a certification stating that he or she is a separate economic unit from the existing Lifeline subscriber. Acceptable proof of address includes: state or federally issued identification, a utility bill with the subscriber's name and address, or any other documentation to verify the subscriber's address. If the Board deems the applicant eligible for Lifeline benefits, then an exception code is provided that will permit the Board to override the duplicate controls in the database and allows the applicant to be enrolled as a subscriber.

B. Describe how the Database Web Application and the Monthly ETC Submission on CD Interact to Allow for Updates to Subscriber Records and Auditing of Subscriber Records to Scrub Individual and Household Duplicates from ETCs' Subscriber Rolls.⁷

1. The Board is Moving Toward On-Line Updates to Subscriber Records

ETCs in Puerto Rico currently can update the database for new individual subscribers in real time. The Board is working toward implementing a fully web-based system that will allow ETCs to make updates to the database online for existing subscribers; for example, by updating the database when a Lifeline subscriber terminates service, ports, or switches carriers. Under these circumstances, the ETC will be able to de-enroll a Lifeline subscriber online. Implementation of the web-based enhancements will occur in stages, beginning in March 2013.

2. <u>Submission of CDs and DVDs will Continue to be Used to Audit Subscriber Rolls Prior to Payment of Benefits</u>

In addition to obtaining a control code for each new subscriber, Puerto Rico's Regulation 8093 § 14.10 requires an ETC to submit to the Board a complete monthly list of its existing Lifeline customers, by the 15th of the following month. The data is submitted via CD or DVD. The process of submitting a monthly CD or DVD will continue, even when ETCs ultimately become able to update the database in real line via the web. The monthly CDs or DVDs will continue to provide the Board with the means to audit the on-line system, to scrub the database for duplicate subscribers, and for Board reimbursements to the ETCs.

Currently, each monthly submission must include the following subscriber information, with no exceptions:⁸

• 9-digit Social Security Number

See id., 27 FCC Rcd at 6748-49, ¶¶ 214-216.

Date of birth, termination date, mailing address, telephone number, and qualifying program will be required fields in early 2013.

- Name
- Paternal Surname
- Maternal Surname
- Address 1 (physical address only)
- Address 2 (physical address only)
- City/Town
- Zip Code
- Enrollment Date
- Control Code

The Board currently uses, and will continue to use, the data submitted on the CDs or DVDs to run a combination of queries based on the data collected above to identify duplicates within each ETC and among the different ETCs; which it uses to notify each ETC of any duplicate subscribers. Then the ETC, using the format approved by the Board, will notify the duplicate subscriber by means of a letter to the postal address of record, stating that the individual is receiving more than one benefit, the date of his or her ineligibility, and his or her right to submit a claim to the Board. This notification must be made within 10 business days from the date sent.

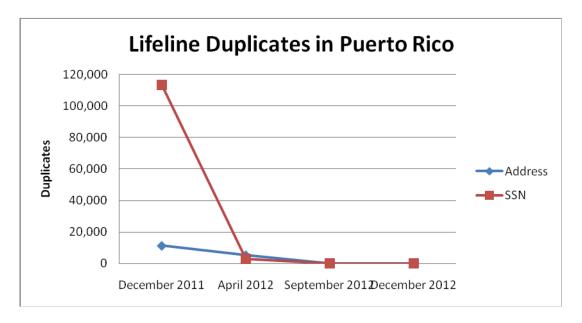
3. <u>Effectiveness of the Combination of On-Line Database Access and</u> Monthly Submission of Subscriber Records on CD or DVD.

Since the Board began using the centralized database in conjunction with the monthly submission of CDs and DVDs to identify duplicate Lifeline subscribers, Puerto Rico has realized an immediate and dramatic decrease in the number of duplicates. During the first month, the database identified 113,294 duplicate social security numbers and 11,367 duplicate addresses. As of September 2012, there were 9 duplicate social security numbers and 105 duplicate addresses. For the months of October, November, and December 2012, respectively, there were 5, 1, and 1 duplicate social security numbers in each month. There were 43, 61, and 47 duplicate

7

⁹ See the Board's Resolution and Order of March 7, 2012.

addresses in October, November, and December 2012, respectively. Going forward, the Board will scrub social security duplicates and addresses on a monthly basis.



C. Describe How the Board Verifies Identification for Subscribers Who Do Not Enroll In Lifeline Through Coordinated Enrollment.

ETCs in Puerto Rico are required to obtain valid, government issued photo identification (*e.g.* passport, driver's license) as part of the initial enrollment process, as well as the subscriber's full social security number. ¹⁰ ETCs must retain copies of the proof of identification submitted by the subscriber.

D. The Board Commits to Retaining Subscriber Records for a Period of Ten Years

The Commission has requested that the Board commit to retaining subscriber records for a period of ten years. The Board agrees that it will archive subscriber records and retain those records for a minimum of ten years.

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See §§ 14.1(d) and 14.10 of Regulation 8093 filed at PR Department of State, on October 2011; the Board's Administrative Order of May 9, 2012.

The Board seeks clarification from the Commission regarding whether the ten-year record retention requirement is met by retaining archived records, or whether on-line access to those records must be available for a 10 year period.

If the Commission finds that it is necessary that the Board provide on-line access to subscriber records for a period of ten years, then the Board will develop a means to provide on-line access to archived subscriber records and will provide an update to the Commission regarding implementation of that process.

IV. CONSEQUENCES OF DENYING PETITION

ETCs in Puerto Rico are required to enter into the database the first name and two surnames, physical address, and telephone number of its Lifeline subscribers, prior to enrolling the customer in Lifeline. The Board has processes in place to both verify and standardize subscriber data. Nevertheless, the standardized data retains a format that is different from the standard format of analogous data in the mainland United States, including double surnames, and addresses that are not in a format recognized by the U.S. Postal Service. If the Board's Petition to Opt Out of the National Lifeline Accountability Database is denied, an alternative method for accepting and standardizing surnames and addresses that comply with Puerto Rico's surname conventions and inconsistent address formats would need to be developed. The consequence of failing to provide a means for accepting database records that mirror Puerto Rico's surname and address conventions is that Puerto Rico residents would be denied Lifeline benefits for which they otherwise would have been eligible.

A. Double Surnames

As shown above, each subscriber record must include the subscriber's first name, paternal surname, and maternal surname, with no exceptions. In addition, unlike the mainland

United States, the paternal surname traditionally appears immediately following the given name, with the maternal surname appearing thereafter. Thus, should the Board's Petition to Opt Out of the National Lifeline Accountability Database be denied, a methodology will be required to align the family names of subscribers in Puerto Rico with the record format in the Lifeline database.

B. Unique Address Formats

Although most addresses in Puerto Rico are recognized by the U.S. Postal Service, certain addresses within Puerto Rico are considered non-traditional. For example, in Puerto Rico most addresses include the subscriber's urbanization name, house number, street name, city, state, and zip code. However, there are areas of Puerto Rico that do not have street names or house numbers. In those instances, an urbanization name is an acceptable substitute for the street name. In other instances, housing projects or apartment buildings may not have street names or consistent unit numbers. In those situations, the house number and complex name may substitute for a street address.

The database in most situations automatically will standardize the address provided by the ETC. If the database is unable to standardize the address, the ETC must provide to the Board the proof of residence submitted to it by the subscriber. Subscribers who fall into this category experience a delay in receiving their Lifeline benefits, while the Board conducts its investigation. Once the customer is deemed qualified, the Board will issue an exceptional Control Code for the subscriber.

Should the Board's Petition to Opt Out of the National Lifeline Accountability Database be denied, a means for resolving Puerto Rico's unique address idiosyncrasies would need to be developed. In the alternative, some Puerto Rico residents will be denied Lifeline benefits for which they otherwise would have been eligible.

V. CONCLUSION

As described above, the Telecommunication Regulatory Board of Puerto Rico meets all of the requirements of Section 54.404(a). The Board has a comprehensive system in place to meet the requirements set forth by the FCC's Lifeline Reform Order and its subsequent Public Notice. Through its database, the Board will continue its endeavors to reduce waste, fraud, and abuse in the USF program. As such, the Board requests the FCC's approval to opt out of the National Lifeline Accountability Database.

Dated: February 7, 2013 Respectfully submitted,

/s/Robert F. Reklaitis

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Counsel for the Telecommunications Regulatory Board of Puerto Rico

Exhibit A

JUNTA REGLAMENTADORA DE TELECOMUNICACIONES DE PUERTO RICO DOCUMENTOS REQUERIDOS PARA LIFELINE	
	g (d/m/y)
Hoja de rechazo por la Compañía ("printout")	_ (0,11,4)
Licencia de Conducir - ID con foto emitida por el estado	
Pasaporte	
Certificado de Elegibilidad (Agencia de Gobierno que le ofreció el beneficio)	
Evidencia de Seguro Social (original)	
Factura en original - (AEE, AAA, Cable o Satélite)	
Planilla Ingreso o Talonarios	
Declaración Jurada	
Contrato de Arrendamiento	77
Certificado de Nacimiento (para casos de un solo apellido)	. a
Certificado de Identificación	
Otros: (Previa Autorización)	5:
OBSERVACION: Todos los documentos tienen que estar vigentes.	
REPRESENTANTE	niciales



Junta Reglamentadora de Telecomunicaciones De Puerto Rico ESTE DOCUMENTO DEBE SER INCLUIDO COMO PARTE DEL EXPEDIENTE DEL SOLICITANTE.

1 de febrero de 2013	3
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Compañía de Telecomunicaciones Elegible

RE: Código de excepción para subsidio LifeLine

A quien pueda interesar:

Como resultado de la investigación realizada por la Junta Reglamentadora de Telecomunicaciones en cuanto a:

- ____1.rechazo por seguro social
 - __2.rechazo por dirección duplicada
- X 3.rechazo por dirección no válida o completa
- ____4.rechazo por un (1) solo apellido

El siguiente cliente ha sido validado bajo el número de excepción 5E9451EF35



BAYAMON 00959

Para suscribir al cliente al subsidio LifeLine, favor de utilizar el código indicado anteriormente, el cual tendrá una vigencia hasta el : 3/2/2013

Cordialment 4

Firma Oficial Autorizado

4 de enero de 2013

San Juan, PR 00959-7746

Estimado (a) Sr(a):

ASUNTO: SOLICITUD SUBSIDIO NO VALIDADA POR LA JRT

Núm. Teléfono:

La Junta Reglamentadora de Telecomunicaciones (JRT), ordena que toda solicitud para obtener el subsidio del Servicio Universal debe ser verificada en su base de datos central mediante la obtención de un código de control, para evitar duplicidad de solicitudes.

Recibimos su solicitud para el beneficio del subsidio de Servicio Universal. La misma fue evaluada y al validarse con la base de datos de la JRT, arrojó un mensaje que no nos permite completar su solicitud.

A tales efectos, le incluimos el documento impreso del sistema, con el cual usted debe visitar la Junta, para que pueda hacer cualquier reclamación. Puede comunicarse con la Junta, llamando al 787-722-8606 ó 787-756-0804 ext. 7010, o visitar sus oficinas en la siguiente dirección:

JUNTA REGLAMENTADORA DE TELECOMUNICACIONES DE P.R. Avenida Roberto H. Todd 500 San Juan, PR 00966

Cuando obtenga el resultado de su reclamación ante la Junta, le exhortamos a comunicarse con CLARO a través del teléfono 787-774-3000, donde gustosamente le orientaremos sobre los diversos planes que se ajustan a su necesidad.

Atentamente.

Representante de Servicios Servicio Universal

Anejo

cof



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	unicaciones de PR al siguier	eta o correcta, ya que no pudo ser valida te número de teléfono 787-722-8613, er Relnicializar Dirección	ida por nuestra aplicación Wob. En caso de rectamaciones, fav n o antes de 20 días.	or Bamar A la Junta
	500	Ave. Roberto H. Torld (Parada 18 – Sa	nturce) San Juan, P.R. 00907 – 3941	
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Metro: 787.62 Replacted In For Rublic Inspection
WWW.acueductospr.com

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eríodo de consumo hasta:

12/26/2012

LIENTE:
IRECCION:

BAYAMON PR 00959

120/2012

RESUMEN DE CARGOS CORRIENTES

CARGOS POR AGUA:

FECHA DE FACTURA:

NUMERO DE FACTURA: FECHA DE VENCIMIENTO:

\$10.60

01/23/2013

01/02/2012

CARGOS POR ALCANTARILLADO

\$9.11

CARGOS CORRIENTES:

\$19.71

CONTADOR

09009987

IMPORTE

\$19.71

FECHA / LECT. ACTUAL

CONSUMO CONSUMO FACTURADO

12/26/2012

419

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A SIGNIFICA CONSUMO POR LECTURA REAL

CARGOS / CREDITOS

LANCE ANTERIOR \$19.71
GOS \$19.71 CR

AGOS CORRIENTES

El cargo corriente de este mes refleja la mitad del consumo en metros cúbicos en el periodo. Este mes su factura incluye la primera mitad del cargo \$19.71, y la factura del mes siguiente incluirá la otra mitad, \$19.71. El Total a Pagar de esta factura incluye la primera mitad del cargo, y además puede incluir ajustes, cualquier balance vencido u otras transacciones financieras del período.



LANCE ACTUAL

\$19.71

TAL A PAGAR:

\$19.71



Autoridad de Acueductos y Alcantarillados TALON DE PAGO - DESPRENDA POR ESTA PERFORACIÓN

P.O. BOX 70101, SAN JUAN, PR 00936-8101

CLIENTE:

DATOS DE LA CUENTA

CLASE DE SERVICIO: Residencial DIAMETRO DEL CONTADOR: 5/8" DIAS DE CONSUMO FACTURADO: 34

NUMERO DE CUENTA:

FECHA DE VENCIMIENTO:

01/23/201

TOTAL A PAGAR:

\$19.71

CANTIDAD ENVIADA:

FECHA DE FACTURA:

01/02/2011

KIGISAMBO DE EXOTURAL



Date: November 26, 2012

Claim Number:



You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

Information About Current Social Security Benefits

Beginning December 2012, the full monthly Social Security benefit before any deductions is.....\$ 758.00

We deduct \$83.90 for medical insurance premiums each month.

The regular monthly Social Security payment is......\$ 674.00 (We must round down to the whole dollar.)

Social Security benefits for a given month are paid the following month. (For example, Social Security benefits for March are paid in April.)

Your Social Security benefits are paid on or about the third Wednesday of each month.

Medicare Information

You are entitled to hospital insurance under Medicare beginning September 2011.

You are entitled to medical insurance under Medicare beginning September 2011.

Type of Social Security Benefit Information

You are entitled to monthly disability benefits.

